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EXHIBIT A

VERIFICATION

The undersigned Assistant United States Attorney, pursuant to LRCiv 3.6(b), states that the attached documents are true and correct copies of the court file for the matter captioned *Amanda McKay v. Maria Mylene Fabia Abad M.D. and Sun Life Center for Women & Children, Inc.*, CV2015-01655 (Pinal County Ct., September 4, 2015), received from the Clerk of the Court, Pinal County Superior Court, in response to the request of the United States Attorney's Office for a complete copy of the file.

DATED this 19th of November, 2015.

/s Anne E. Nelson
ANNE E. NELSON
Assistant United States Attorney
District of Arizona

In the Superior Court of the State of Arizona
In and For the County of PINAL

Case Number Cv 01501655

CIVIL COVER SHEET- NEW FILING ONLY
(Please Type or Print)

Plaintiff's Attorney M. DAVID KARNAS DANIEL A. WASHBURN

Attorney Bar Number 013728

Plaintiff's Name(s): (List all)
AMANDA MCKAY on behalf of herself and
statutory beneficiaries of [REDACTED]

Plaintiff's Address:
BELLOVIN & KARNAS, P.C.
4810 E. BROADWAY BLVD.
TUCSON, AZ 85711

(List additional plaintiffs on page two and/or attach a separate sheet).

Defendant's Name(s): (List All) MARILYN MYLENE FABIA ABAD, M.D., et ux., SUN LIFE CENTER FOR
WOMEN AND CHILDREN, INC.

(List additional defendants on page two and/or attach a separate sheet)

EMERGENCY ORDER SOUGHT: ☐ Temporary Restraining Order ☐ Provisional Remedy ☐ OSC
☐ Election Challenge ☐ Employer Sanction ☐ Other _____

(Specify)

☒ **RULE 8(i) COMPLEX LITIGATION APPLIES.** Rule 8(i) of the Rules of Civil Procedure defines a "Complex Case" as civil actions that require continuous judicial management. A typical case involves a large number of witnesses, a substantial amount of documentary evidence, and a large number of separately represented parties.
(Mark appropriate box on page two as to complexity, **in addition** to the Nature of Action case category).

☐ **THIS CASE IS ELIGIBLE FOR THE COMMERCIAL COURT UNDER RULE 8.1.** Rule 8.1 defines a commercial case and establishes eligibility criteria for the commercial court. Generally, a commercial case primarily involves issues arising from a business contract or business transaction. However, consumer transactions are not eligible. A consumer transaction is one that is primarily for personal, family or household purposes. **Please review Rule 8.1 for a complete list of the criteria.** See <http://www.superiorcourt.maricopa.gov/commercial-court/>. You must check this box if this is an eligible commercial case. **In addition, mark the appropriate box below in the "Nature of Action" case category.** The words "commercial court assignment requested" must appear in the caption of the original complaint.

NATURE OF ACTION

(Place an "X" next to the **one** case category that most accurately describes your primary case.)

TORT MOTOR VEHICLE:

- ☐ Non-Death/Personal Injury
☐ Property Damage
☐ Wrongful Death

TORT NON-MOTOR VEHICLE:

- ☐ Negligence
☐ Product Liability – Asbestos
☐ Product Liability – Tobacco
☐ Product Liability – Toxic/Other
☐ Intentional Tort
☐ Property Damage
☐ Legal Malpractice
☐ Malpractice – Other professional

- ☐ Premises Liability
☐ Slander/Libel/Defamation
☐ Other (Specify) _____

MEDICAL MALPRACTICE:

- ☒ Physician M.D. ☐ Hospital
☐ Physician D.O. ☒ Other

CONTRACTS:

- ☐ Account (Open or Stated)
☐ Promissory Note

CONTRACTS: (Continued)

- ☐ Foreclosure
☐ Buyer-Plaintiff
☐ Fraud

- ☐ Other Contract (i.e. Breach of Contract)
☐ Excess Proceeds-Sale
☐ Construction Defects (Residential/Commercial)
 ☐ Six to Nineteen Structures
 ☐ Twenty or More Structures

OTHER CIVIL CASE TYPES:

- ☐ Eminent Domain/Condemnation
☐ Eviction Actions (Forcible and Special Detainers)
☐ Change of Name
☐ Transcript of Judgment
☐ Foreign Judgment
☐ Quiet Title
☐ Forfeiture
☐ Election Challenge
☐ NCC- Employer Sanction Action (A.R.S. §23-212)
☐ Injunction against Workplace Harassment
☐ Injunction against Harassment
☐ Civil Penalty
☐ Water Rights (Not General Stream Adjudication)
☐ Real Property
☐ Special Action against Lower Courts
 (See lower court appeal cover sheet in Maricopa)
☐ Immigration Enforcement Challenge (§§1-501, 1-502, 11-1051)

UNCLASSIFIED CIVIL:

- ☐ Administrative Review
 (See lower court appeal cover sheet in Maricopa)
☐ Tax Appeal
 (All other tax matters must be filed in the AZ Tax Court)
☐ Declaratory Judgment
☐ Habeas Corpus
☐ Landlord Tenant Dispute- Other
☐ Declaration of Factual Innocence (A.R.S. §12-771)
☐ Declaration of Factual Improper Party Status
☐ Vulnerable Adult (A.R.S. §46-451)
☐ Tribal Judgment
☐ Structured Settlement (A.R.S. §12-2901)
☐ Attorney Conservatorships (State Bar)
☐ Unauthorized Practice of Law (State Bar)
☐ Out-of-State Deposition for Foreign Jurisdiction
☐ Secure Attendance of Prisoner
☐ Assurance of Discontinuance
☐ In-State Deposition for Foreign Jurisdiction
☐ Eminent Domain- Light Rail Only
☐ Interpleader- Automobile Only
☐ Delayed Birth Certificate (A.R.S. §36-333.03)
☐ Employment Dispute- Discrimination
☐ Employment Dispute-Other
☐ Other _____

(Specify)

COMPLEXITY OF THE CASE

If you marked the box on page one indicating that Complex Litigation applies, place an "X" in the box of no less than one of the following:

- ☐ Antitrust/Trade Regulation
☐ Construction Defect with many parties or structures
☐ Mass Tort
☐ Securities Litigation with many parties
☐ Environmental Toxic Tort with many parties
☐ Class Action Claims
☐ Insurance Coverage Claims arising from the above-listed case types
☐ A Complex Case as defined by Rule 8(i) ARCP

Additional Plaintiff(s)

Additional Defendant(s)

FILED
AMANDA STANFORD
CLERK OF SUPERIOR COURT
2015 SEP -4 PM 3:44
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BY _____ DEPUTY

BELLOVIN & KARNAS, P.C.
4810 E Broadway Blvd
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Jeffrey L. Victor, Esq. (SBN 013132)
victoratty@aol.com
Attorney for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PINAL

AMANDA MCKAY, on behalf of herself
and all statutory beneficiaries of
[REDACTED] and pursuant to
A.R.S. § 12-612;

Plaintiff,

vs.

MARIA MYLENE FABIA ABAD, M.D.,
et ux.; **SUN LIFE CENTER FOR**
WOMEN & CHILDREN, INC., an
Arizona corporation,

Defendants.

NO. *Cur* 01501655

COMPLAINT

(Medical Professional Negligence)

(Jury Trial Requested)

DANIEL A. WASHBURN

Plaintiff, by and through counsel undersigned, hereby files their Complaint against
the Defendants, and in support thereof states and alleges as follows:

I. PARTIES, JURISDICTION, AND VENUE

Complaint - 2

- 1 2. Defendant Maria Mylene Fabia Abad, M.D. (hereinafter “Dr. Abad” or “Defendant
2 Abad”), is a licenced medical doctor in the state of Arizona, and upon information
3 and belief, at all relevant times, acted as employee or agent for Defendant Sun Life
4 Center for Women & Children. Defendant Abad was Madison Coronado’s
5 pediatrician.
6
- 7 3. Defendant Sun Life Center for Women & Children (hereinafter, “Defendant Sun
8 Life”) is an Arizona corporation providing medical services to the general public.
9 Sun Life, through Defendant Abad, its agents, employees, and contractors provided
10 medical and health care services to [REDACTED].
11
- 12 4. The identity, capacity, and involvement of the fictitiously designated Defendants are
13 presently unknown but will be appropriately designated when ascertained.
14
- 15 5. Venue properly lies in this Court pursuant to A.R.S. §12-401 et al., as the acts or
16 omissions giving rise to this action took place in Pinal County, Arizona. Defendants
17 are residents of Pinal County, Arizona.
18
- 19 6. At all times material hereto, all acts complained of by the Plaintiff occurred in Pinal
20 County, Arizona.
21

22 **II. GENERAL FACTUALS ALLEGATIONS**

- 23 7. On October 24, 2013, [REDACTED] was born without any
24 complications. She had Early and Periodic Screening, Diagnostic and Treatment
25
26
27
28

1 (EPSDT) at 5 days, 4 weeks, and 9 weeks of age with no issues, and normal growth
2 and development.

3
4 8. On February 5, 2014 at fourteen weeks old, [REDACTED] was taken by her mother,
5 Plaintiff Amanda McKay, to Defendant Sun Life Center for Women & Children
6 clinic to see Defendant Maria Mylene Fabia Abad, M.D. with complaints of not
7 eating well and spitting up a lot.

8
9 9. On February 20, 2014, at sixteen weeks old, [REDACTED] and her mother Ms. McKay
10 returned to Defendant Sun Life with increasing problems, losing voice, hoarseness,
11 high pitched cough, and very phlegmy. Defendant Abad wrote "no foreign body
12 suspected" on her notes.

13
14 10. On February 28, 2014, at seventeen weeks old, [REDACTED] was seen at home for an
15 EPSDT check where it is noted that Plaintiff McKay is still concerned that her child's
16 cough is not getting any better. However, the nurse performing this check does not
17 instruct Ms. McKay to return to the doctor.

18
19 11. On March 18, 2014, at nineteen weeks old, [REDACTED] is taken to Defendant Sun Life
20 for the third time with complaints that she is more phlegmy and coughing. Defendant
21 Abad assesses the child with cough, chest congestion, and phlegm. Defendant Abad
22 does not order any tests to rule out throat swelling or other lung issues which could
23 be causing cough and phlegm. [REDACTED] was given a prescription for an antibiotic
24 and sent home.
25
26
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28

1 12. Ms. McKay took her child to the Emergency Room at Casa Grande Regional Medical
2 Center at around 3:00 a.m. on April 3, 2014, as [REDACTED] was limp, and had trouble
3 breathing for about fifteen minutes. Vital signs on admission to the Emergency
4 Department were: Temperature 96.4, Pulse 99, Respirations 42, and oxygen
5 saturation 89% on room air, respiratory sounds consistent with stridor. All of these
6 vital signs are abnormal. [REDACTED] was admitted to Casa Grande Regional Medical
7 Center for overnight observation with a diagnosis of croup. Defendant Abad wrote
8 in her History and Physical that the cough "only started tonight", when in reality the
9 cough had been going on for almost two months. [REDACTED] is placed in a mist tent
10 with oxygen flowing and given 8 doses of Racemic Epinerphrine every two to three
11 hours. [REDACTED] went 12 hours without the need for a Racemic Epinephrine treatment
12 prior to discharge.
13

14 13. [REDACTED] continued to be in a mist tent until April 4, 2014.

15 14. On April 4, 2014, initial Respiratory Syncytial Virus (RSV) swab results returned as
16 negative and Madison was discharged home with no home medications or treatment
17 orders except to follow up in office the following Monday. However, the final RSV
18 results were reported positive after [REDACTED] had already been discharged.
19

20 15. On April 7, 2014, Plaintiff McKay took her daughter [REDACTED] back to Defendant
21 Abad as instructed for a follow up post hospitalization. [REDACTED] continued with
22 cough, congestion and mild vocal congestion. Defendant Abad misdiagnosed
23
24
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1 Madison and prescribed Albuterol nebulizer three times a day at home for one week
2 and instructed Ms. McKay to call in a week to determine if this helped.

3
4 16. On April 7, 2014 [REDACTED] was given a breathing treatment at bedtime by Ms.
5 McKay.

6 17. On April 8, 2014 [REDACTED] was given a breathing treatment in the morning, around
7 6:00 p.m., and again at 11:00 p.m. [REDACTED] was then given a bottle and put to bed.

8
9 18. On April 9, 2014 Plaintiff McKay returned home from work at 2:10 a.m. and went
10 on to check on her child. Ms. McKay noticed [REDACTED] not breathing, lying on
11 abdomen and immediately called 911 who continued rescue efforts to hospital.

12
13 19. [REDACTED] was pronounced dead on April 9, 2014 at 2:59 a.m.

14 20. The death certificate specifies the immediate cause of death as "bronchopneumonia
15 due to or as a consequence of lodged foreign body in esophagus."

16
17 21. The Autopsy Report states, "Death of this infant is due to bronchopneumonia due to
18 a foreign body (piece of Christmas tree ornament) lodged within the esophagus. The
19 foreign body likely led to chronic airway obstruction and ultimately the resultant
20 pneumonia."
21

22 23 24 **III. CLAIMS**

25 **Count One – All Defendants Medical Negligence**

26 22. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth
27 herein and further alleges as follows:
28

1 23. All Defendants and each of them, at all relevant times, owed a duty of care to the
2 patients in their charge including [REDACTED] deceased. Inherent in this duty
3 rested an obligation to reasonably and prudently examine, monitor, and evaluate their
4 patients so as to provide timely and proper treatment and diagnosis.
5

6 24. Defendants' duties required that, among other things, they instigate timely
7 intervention, proper treatment, and to correct injuries in such a manner that
8 preventable permanent injuries are not subsequently sustained by the patients in their
9 care.
10

11 25. All Defendants breached the foregoing duties by failing, despite clear clinical
12 indications, to properly diagnose, and instigate treatment in response to Plaintiff's
13 daughter's symptoms and findings. This failure and misdiagnosis resulted in the death
14 of [REDACTED], a five month old child.
15

16 26. Had the Defendants provided the requisite level of medical attention and
17 intervention warranted based on the findings under the applicable standard of care,
18 the death of [REDACTED] could have been avoided. These breaches of duty
19 exemplify substandard care and stand as the actual and proximate causes of [REDACTED]
20 [REDACTED] death and Plaintiff's pain and suffering
21

22 27. Defendants failed to exercise that degree of care, skill and learning expected of a
23 reasonable, prudent health care provider in the same profession or class, within the
24 State, acting in the same or similar circumstances.
25
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1 28. Defendants' breach of their duties, as described above, directly and proximately
2 caused [REDACTED] death and Plaintiff's suffering as enumerated below and
3 more fully stated in the ad damnum clause of this Complaint. As a direct and
4 proximate cause of the Defendants' negligent acts and omissions, Plaintiff and the
5 statutory beneficiaries suffered and will continue to suffer harm.
6

7
8 29. Defendant Maria Mylene Abad, M.D. owed a duty of care to Plaintiff McKay's
9 infant daughter, [REDACTED]. This duty of care required that Defendant Abad
10 properly examine, evaluate, diagnose and treat [REDACTED]. The Defendant
11 failed to properly diagnose [REDACTED], indeed misdiagnosing her, leading to
12 a delay in treatment and intervention. Defendant Abad failed to properly examine
13 and diagnose [REDACTED] and recognize a medical emergency.
14

15
16 30. The Doctrine of Respondent Superior attributes all such breaches of duty and all
17 further breaches revealed during the course of discovery to the employers, principals
18 or contracting partners of the individual Defendants. All Defendants are vicariously
19 liable for the acts, omissions and negligent transgressions of their employees, agents
20 and/or contractors.
21

22 31. Defendants failed to diagnose a condition on separate occasions and are actually and
23 proximately at fault for the wrongful death of [REDACTED].
24

25 32. [REDACTED] was an infant child who died as a result of the negligence of the
26 Defendants. Had Defendant Abad followed the medical procedures and noticed
27 Madison's symptoms in a timely manner, [REDACTED] would be alive today.
28

1 33. Defendants actually and proximately caused the death of [REDACTED]

2 34. Plaintiff and the statutory beneficiaries were immediately, irreparably injured by
3 [REDACTED] death. Plaintiff has experienced personal anguish, shock, suffering,
4 sorrow, pain, severe emotional distress, loss of consortium and anxiety. Plaintiff has
5 also lost the love, society, affection, and companionship of her first and only child.
6
7

8
9 **Count Two – Negligence – Sun Life Center for Women & Children, Inc.**
10 **(“Sun Life”)**

11
12 35. Plaintiff realleges and incorporates all preceding paragraphs as if fully set forth
13 herein.

14 36. Defendant Sun Life Center for Women & Children, is independently negligent for
15 failing to, among other things, having proper policies and procedures in place to
16 prevent such harm from occurring. Defendant Sun Life failed to execute on rules
17 and regulations and failed to monitor care.
18

19
20 37. Plaintiff and the statutory beneficiaries were immediately and irreparably injured by
21 the death of Madison Coronado. Plaintiff has experienced

22 38. Plaintiff and the statutory beneficiaries have suffered and will in the future suffer
23 injuries including but not limited to loss of consortium, mental and emotional
24 distress, and the inability to enjoy life as they previously were able to.
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IV. AD DAMNUM

WHEREFORE, as a direct result of Defendant's negligent acts and omissions, Plaintiff prays for judgment and request that this Court:

- A. Award Plaintiff general damages in a just and reasonable sum;
- B. Award Plaintiff all special damages in a sum to be determined herein;
- C. Order Defendants and all of them to pay Plaintiff's costs;
- D. Order Defendants and all of them to pay prejudgment interest on all liquidated sums award; and
- E. Grant to Plaintiff such other and further relief as this Court deems just and proper.

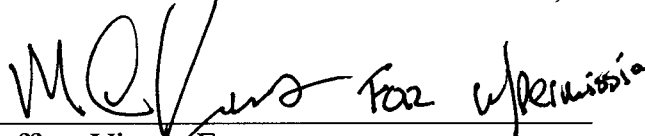
DATED this 2nd day of ~~August~~ ^{SEPTEMBER}, 2015.

BELLOVIN & KARNAS, P.C.



M. David Karnas, Esq.
Attorneys for Plaintiff

LAW OFFICES OF JEFFREY VICTOR, P.C.



Jeffrey Victor, Esq.
Attorneys for Plaintiff

FILED
AMANDA STANFORD
CLERK OF SUPERIOR COURT
2015 SEP -4 PM 3:44
BY ERM
DEPUTY

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Phone: 602-749-9000
Jeffrey L. Victor, Esq. (SBN 013132)
victoratty@aol.com
Attorney for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PINAL

AMANDA MCKAY, on behalf of herself
and all statutory beneficiaries of
[REDACTED] and pursuant to
A.R.S. § 12-612;

Plaintiff,

vs.

MARIA MYLENE FABIA ABAD, M.D.,
et ux.; **SUN LIFE CENTER FOR**
WOMEN & CHILDREN, INC., an
Arizona corporation,

Defendants.

NO. 01501655

**CERTIFICATE REGARDING
EXPERT TESTIMONY**

DANIEL A. WASHBURN

Pursuant to Arizona Revised Statutes, Section 12-2602(A), Plaintiff hereby
certifies that expert opinion may be necessary to prove the Defendant health care
professionals' standard of care or liability for the claims asserted in the Plaintiff's

1 complaint and that such certification will be served at or before the time for Plaintiffs'
2 Rule 26.1 Initial Disclosure Statement.

3
4 These certifications are made subject to the provisions of Rule 11(a) of the Arizona
5 Rules of Civil Procedure.

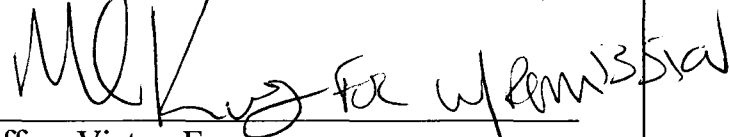
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7 DATED this 21 ^{SEPTEMBER} day of ~~August~~, 2015.

10 BELLOVIN & KARNAS, P.C.

11 
12

13 M. David Karnas, Esq.
14 Attorneys for Plaintiff

16 LAW OFFICES OF JEFFREY VICTOR, P.C.

17 
18 Jeffrey Victor, Esq.
19 Attorneys for Plaintiff
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Phone: 602-749-9000
Jeffrey L. Victor, Esq. (SBN 013132)
victoratty@aol.com
Attorney for Plaintiff

FILED
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CLERK OF SUPERIOR COURT
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BY _____
DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PINAL

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Plaintiff,

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et ux.; **SUN LIFE CENTER FOR**
WOMEN & CHILDREN, INC., an
Arizona corporation,

Defendants.

NO. *CNR* 01501655

**CERTIFICATE OF COMPULSORY
ARBITRATION**

DANIEL A. WASHBURN

The undersigned counsel certifies that the largest award sought by the complainant, including punitive damages, but excluding interest, attorney's fees, and costs, does exceed the limits set by Local Rule 4.2(a) for compulsory arbitration. This case is not subject to Arbitration.

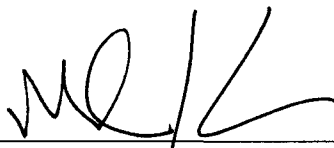
1 I further certify that I have read this certificate of compulsory arbitration and the
2 Complaint filed herewith, and that to the best of my knowledge, information, and belief,
3 formed after reasonable inquiry, it is warranted; and, that the allegation is not set forth for
4 any improper purpose.
5

6 I understand that I have an affirmative duty to reasonably amend this Certificate if
7 I obtain information from which I know this certification either was incorrect when made,
8 or though correct when made, is no longer true.
9


10 These certifications are made subject to the provisions of Rule 11(a) of the Arizona
11 Rules of Civil Procedure.
12

13
14 DATED this 2nd day of ~~August~~ ^{SEPTEMBER}, 2015.

15 BELLOVIN & KARNAS, P.C.

16
17 
18 _____
19 M. David Karnas, Esq.
20 Attorneys for Plaintiff

21 LAW OFFICES OF JEFFREY VICTOR, P.C.

22
23  for *affirmation*
24 _____
25 Jeffrey Victor, Esq.
26 Attorneys for Plaintiff
27
28

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victoratty@aol.com
Attorney for Plaintiff

FILED
AMANDA STANFORD
CLERK OF SUPERIOR COURT

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BY

DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PINAL

AMANDA MCKAY, on behalf of herself
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[REDACTED] and pursuant to
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et ux.; **SUN LIFE CENTER FOR**
WOMEN & CHILDREN, INC., an
Arizona corporation,

Defendants.

NO. *OW* **01501655**

SUMMONS

DANIEL A. WASHBURN

THE STATE OF ARIZONA to the Defendant and its attorneys:

MARIA MYLENE FABIA ABAD, M.D.
Sunlife Center for Women and Children
1856 East Florence Blvd.
Casa Grande, AZ 85128

ORIGINAL

WWW

- I. A lawsuit has been filed against you.
- II. YOU ARE HEREBY SUMMONED and required to appear and defend, in the above entitled action, within TWENTY (20) DAYS after the service of the Summons and Complaint upon you, exclusive of the date of service. If served outside the State of Arizona, you shall appear and defend within THIRTY (30) days, exclusive of the date of service.
- III. If you do not want judgment taken against you for the relief demanded in the accompanying Complaint, you must file a response in writing in the Clerk of the Pinal Superior Court, 971 Jason Lopez Circle, Building A, P O Box 2730, Florence, Arizona, accompanied by the necessary filing fee.
- IV. This is a legal document. If you do not understand its consequences, you should seek the advice of an attorney.
- V. Requests for reasonable accommodation for persons with disabilities must be made to the court by parties at least three working days in advance of a scheduled court proceeding.
- VI. . You are required by law to serve a copy of your response or answer upon the Plaintiff/Attorney addressed as follows:

**M. David Karnas, Esq.
BELLOVIN & KARNAS, P.C.
4810 East Broadway Blvd.
Tucson, Arizona 85711**

1
2 **WITNESS My Hand and the Seal of the Superior Court.**

3
4 Dated: Sept. 4, 2015

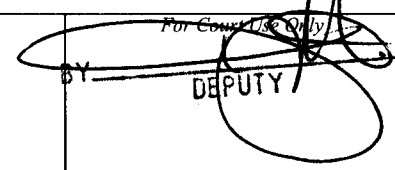
5 AMANDA STANFORD
6 CLERK OF THE SUPERIOR COURT

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8 BY Cicia H. Morrow
9 Deputy Clerk

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FILED
AMANDA STANFORD
CLERK OF SUPERIOR COURT

15 OCT 12 PM 2:24

Attorney or Party without Attorney: M. David Karnas, Esq. #013728 BELLOVIN & KARNAS, P.C. 4810 E. BROADWAY BLVD. TUCSON, AZ 85701 Telephone No: 5205719700				For Court Use Only BY  DEPUTY
Attorney for: Plaintiff				
Ref. No. or File No.: ISSUE AND SERVE				
Insert name of Court, and Judicial District and Branch Court: SUPERIOR COURT OF ARIZONA, COUNTY OF PINAL				
Plaintiff: AMANDA MCKAY, ET AL				
Defendant: MARIA MYLENE FABIA ABAD, M.D., ET AL				
AFFIDAVIT OF SERVICE SUMMONS		Hearing Date:	Time:	Dept/Div:
				Case Number: CV201501655

- At the time of service I was at least 21 years of age and not a party to this action.
- I served copies of the SUMMONS; COMPLAINT; CERTIFICATE OF COMPULSORY ARBITRATION; CERTIFICATE REGARDING EXPERT TESTIMONY
- Party served: MARIA MYLENE FABIA ABAD, M.D.
 - Person served: MARIA MYLENE FABIA ABAD, Asian, Female, Black Hair, 5 Feet 6 Inches, 110 Pounds
- Address where the party was served: SUNLIFE CENTER FOR WOMEN AND CHILDREN
1856 EAST FLORENCE BOULEVARD
CASA GRANDE, AZ 85128
- I served the party:
 - by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Tue., Sep. 29, 2015 (2) at: 4:08PM

Service: \$16.00, Mileage: \$168.00, Notary: \$10.00, Wait: \$.00, Fees Advanced: \$.00, Total: \$194.00

 a. Carlos Bialek
 Registration #B200960039 ^{PINAL} ~~Maricopa~~

I Declare under penalty of perjury under the laws of the State of

ARIZONA that the foregoing is true and correct.


 1511 West Beverly Blvd.
 Los Angeles, CA 90026
 Telephone (213) 250-9111
 Fax (213) 250-1197
 www.firstlegalnetwork.com

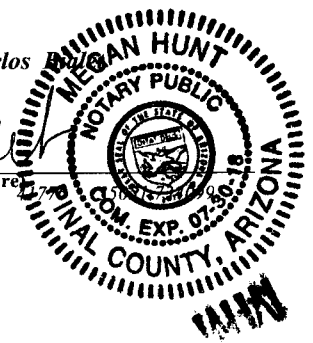
 10-2-15
 (Date)


 (Signature)

- STATE OF ARIZONA, COUNTY OF Pinal
 Subscribed and sworn to (or affirmed) before me on this 2 day of October by Carlos
 proved to me on the basis of satisfactory evidence to be the person who appeared before me.

AFFIDAVIT OF SERVICE
SUMMONS

(Notary Signature)



Attorney or Party without Attorney: M. DAVID KARNAS BELLOVIN & KARNAS, P.C. 4810 E. BROADWAY BLVD. TUCSON, AZ 85701 Telephone No: 5205719700		For Court Use Only FILED AMANDA STANFORD CLERK OF SUPERIOR COURT 2015 OCT -2 PM 3:01 BY <u><i>AS</i></u> DEPUTY	
Attorney for: Plaintiff		Ref. No. or File No.:	
Insert name of Court, and Judicial District and Branch Court: PINAL COUNTY SUPERIOR COURT, STATE OF ARIZONA			
Plaintiff: Amanda McKay, On Behalf Of Herself And All Statutory Beneficiaries Of Madison Coro Defendant: Maria Mylene Fabia Abad, M.D., Et Ux., Sun Life Center For Women & Children, Inc.			
AFFIDAVIT OF SERVICE		Hearing Date:	Time:
		Dept/Div:	Case Number: <u>CR2015011655</u>

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the SUMMONS; COMPLAINT; CERTIFICATE OF COMPULSORY ARBITRATION; CERTIFICATE REGARDING EXPERT TESTIMONY
3. a. Party served: **SUN LIFE CENTER FOR WOMEN AND CHILDREN BY SERVICE UPON ITS STATUTORY AGENT STEPHEN R. COOPER**
 b. Person served: **STEVE R. COOPER, STATUTORY AGENT, Caucasian, Male, 48 Years Old, Brown Hair, 5 Feet 10 Inches, 185 Pounds**
4. Address where the party was served: **221 N. FLORENCE ST.
CASA GRANDE, AZ 85122**
5. I served the party:
 - a. by **personal service**. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Wed., Sep. 16, 2015 (2) at: 2:02PM
6. The "Notice to the Person Served" (on the Summons) was completed as follows:
 - a. as an individual defendant
7. **Person Who Served Papers:**
 - a. Tom J Rankin
 - b. **Registered in Pinal County**
 First Legal Support Services
 3737 N 7th Street, Suite 125
 PHOENIX, AZ 85003
 c. (602) 248-9700

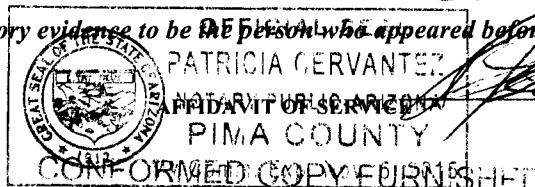
Fee for Service: \$197.00

I Declare under penalty of perjury under the laws of the State of ARIZONA that the foregoing is true and correct.

9-29-15
(Date)

Tom J Rankin
(Signature)

8. **STATE OF ARIZONA, COUNTY OF** Pima
 Subscribed and sworn to (or affirmed) before me on this 30 day of September by Tom J Rankin
 proved to me on the basis of satisfactory evidence to be ~~the person who appeared before me.~~



(Notary Signature)

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